

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

This document relates to: All Cases.

MASTER DOCKET

18-md-2865 (LAK)

**MOTION FOR ISSUANCE OF A REQUEST FOR INTERNATIONAL JUDICIAL  
ASSISTANCE TO OBTAIN EVIDENCE IN THE UNITED KINGDOM**

PLEASE TAKE NOTICE that the undersigned attorneys for the plaintiff SKATTEFORVALTNINGEN (“SKAT”), the Customs and Tax Administration of the Kingdom of Denmark, will apply before the Honorable Lewis A. Kaplan of the Southern District of New York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a time and date to be determined by the Court, for the issuance of a Request for International Judicial Assistance Pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil and Commercial Matters and 28 U.S.C. § 1781(b)(2). In support of this motion, SKAT relies upon the accompanying Memorandum of Law and Declaration of Neil J. Oxford dated April 9, 2021 and the exhibits attached thereto.

Dated: New York, New York  
April 9, 2021

HUGHES HUBBARD & REED LLP

By: /s/ Neil J. Oxford

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